## Exhibit 6B

July 22, 2014 Expert Witness Report of Stuart Ira Wohl (excerpted)

## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re

Chapter 9 Case No. 13-53846

City of Detroit, Michigan Debtor

REPORT OF STUART I. WOHL

I, STUART I. WOHL, subject to the penalties provided by law for perjury, do hereby declare the following to be true and correct based on my personal knowledge and upon information provided by the City of Detroit.

- 1. I am currently a Senior Vice President, East Region Health Practice Leader and National Retiree Health Practice Leader of The Segal Company. I have more than 26 years of health consulting experience with The Segal Company. I have been Segal's Retiree Health Practice Leader for more than ten years and the East Region's Health Practice Leader for more than six years. Prior to The Segal Company, I worked in the Actuarial and/or Underwriting Departments at two insurance companies.
- 2. The Segal Company was founded in 1939 and is one of the nation's leading actuarial and employee benefit plan consulting firms. The Segal Company provides pension and health benefit consulting services. Segal maintains a staff of approximately 1,000 and has offices in 22 cities in the United States and Canada. Segal provides employee

- benefits and human resource consulting to more than 2,500 clients. We consult on the full range of health and welfare, retirement and human resources-related issues.
- 3. As Segal's Retiree Health Practice Leader, I provide thought leadership and guidance to our actuaries and staff regarding retiree health benefits and retiree health valuations. I also help with developing policies, procedures, and guidelines for use in retiree health consulting.
- 4. As the East Region's Health Practice Leader, I provide thought leadership, guidance, and management of the health consulting practice within Segal's East Region. I also provide direct consulting services to certain Segal clients including a number of retiree-only plans, some of which maintain Voluntary Employee Beneficiary Associations (VEBAs), and a number of large Public Sector clients including the health plans for active and retired employees for the State of Delaware, the retiree health plan offered through the Pennsylvania School Employee Retirement System and the New Mexico Retiree Health Care Authority.
- 5. During my 26 years at The Segal Company, I have provided support in many bankruptcies, usually in Bankruptcy Code Section 1114 matters. In such instances, I was part of the team providing support to a Section 1114 Committee or a union. I was part of the team providing support to Section 1114 Committees in bankruptcies of: Eastern Airlines; Pan Am Airways; United Airlines; Northwest Airlines; American Airlines; Federated Department Stores; Lone Star Industries; Solutia; Eastman Kodak; Copperweld Steel; LTV Steel; Bethlehem Steel; Bonwit Teller; HK Porter, and Dana Corporation.
- 6. I have spoken numerous times on retiree health benefits and other health topics including:
  - Teamster Trustees Benefits and Capital Strategies Session, November 2, 2007
     "Retiree Health VEBAs Are they the Solution?"

- American Bankruptcy Institute's 19<sup>th</sup> Annual Winter Leadership Conference,
   December 2, 2007, "Section 1114 Issues in Large and Middle-Market Cases."
- American Bar Association, Section of Labor and Employment Law, Employee
   Benefits Committee, March 1, 2008, "New Developments in Funding Retiree
   Medical with a VEBA."
- Pensions and Capital Stewardship Project, Labor and Worklife Program, Harvard Law School, Capital Matters: Managing Labor's Capital Conference, April 18, 2008, "What to Do While Waiting for Universal Health Insurance: Are VEBAs and Other Pre-Funded Schemes Part of the Solution or Part of the Problem?"
- 2010 CONNPELRA Annual Conference, June 4, 2010, "Health Care Reform: First Steps for Public Sector Plans."
- Graphic Communications Conference, September 23, 2011, "Health Care Reform: Issues for Multi-Employer Plans and for Collective Bargaining."
- 7. I was the primary author of Segal's Winter 2008 Survey, "Study of Retiree Health VEBAs," as well as the author of a March 2008 article for Employee Benefit News, "Retiree Health VEBAs: A Brief Profile."
- 8. The Segal Company has been retained by the Official Retiree Committee in the City of Detroit Bankruptcy and is being compensated for my time in this matter at the rate of \$535 per hour. Segal's compensation in this matter is not, in any way, contingent upon the outcome of the case.
- 9. I have prepared Affidavits, Declarations and/or provided Deposition testimony in the following matters during the previous four years:
  - AMR Corporation, et al., (Chapter 11 Case No. 11-15463) (United States
     Bankruptcy Court Southern District of New York)

- City of Detroit, Michigan (Chapter 9 Case No. 13-53846) (United States
   Bankruptcy Court Eastern District of Michigan, Southern Division)
- Michael Merrill et al. v. Briggs & Stratton Corporation (Case No. 10-C-700-LA –
   United States District Court, Eastern District of Wisconsin)
- 10. I have also prepared affidavits, declarations and/or provided deposition testimony in the following matters more than 4 years ago:
  - Peter A. Raetsch, et al v. Lucent Technologies (Civil Action No. 2:05-cv-5134
     (PGS) United States District Court, District of New Jersey)
  - Beaty et al v. Continental Automotive Systems U.S., Inc., Case 5:11-cv-00890-CLS (N.D. Ala.)
  - Joseph Tourangeu, Molly Cobbol, Robert Lowell, Robert Frank on behalf of themselves and all others similarly situated v. Uniroyal Inc. (Civ. Act. No. N-28-208 (ANH) – United States District Court, District of Connecticut)
  - Trull v. Dayco Prod LLC (Case No. 1:02-cv-243-LHT), United States District
     Court, Western District of North Carolina
  - Diehl v. Twin Disc, Inc. (Case No. 3:94-cv-50031), United States District Court,
     Northern District of Illinois
  - International Association of Machinists and Aerospace Workers and its Affiliated District Lodges, v. The Boeing Company (Charge NOS 19-CA-24154 before the National Labor Relations Board)

## **OPINION**

11. The purpose of my testimony is to describe the impact of the City's Plan of Adjustment ("POA") upon the health care benefits previously received by the City's retired workers.

As I will describe, the funding available through the POA for Retiree Health Benefits is very limited and will result in significant reductions in the subsidies that were provided

prior to the bankruptcy. It will also expose them to significant risks. The Official Committee of Retirees is supporting the POA, including as to OPEB, despite these risks and funding reductions because any further reductions would have been devastating to Retirees.

## BACKGROUND

- 12. Before the bankruptcy filing and post-filing until February 28, 2014, the City of Detroit (the City) offered health insurance coverage to approximately 17,000 retirees and surviving spouses, plus approximately 7,400 dependent spouses. Not only did the City offer these benefits, the City paid the majority of the costs of such benefits. In many instances, the City paid 100% of the cost of these benefits. Of the approximately 24,700 retirees and spouses, approximately 6,000 are under age 65 and I have been told that approximately 650 are age 65 and older but are not, and will never be, eligible for Medicare.
- 13. Until February 28, 2014, the City offered retirees a choice of plans. For example, according to the 2012-2013 City of Detroit Retiree Modified Option III Plan Enrollment Guide, retirees had as many as five plans from which to choose. Some of the contracts with retirees required monthly contributions, with the actual amount dependent on the Collective Bargaining Agreement and the choice of plan.
- 14. According to a City-provided document titled "City of Detroit, Retiree Legacy Cost Restructuring" dated September 11, 2013, the City projected a net cost for retiree health benefits of around \$176 million for the Fiscal Year Ending in 2014. The City proposed to reduce annual City spending for postretirement health care benefits by \$144 million for FYE 2014 or more than 80% -- from approximately \$176 million per year (per the September 11, 2013 document) to approximately \$31.3 million (per the 6/30/2012 Actuarial Valuation prepared by Milliman).